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9 JAMES P. HUGES and SIERRA S. METZ,  
10 DYLAN H. BARTELS and SAVANNAH D. GALLARDO  
11

12  
13 **UNITED STATES BANKRUPTCY COURT**  
14  
15 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**  
16

17 In re ) Case No. 19-30088-DM  
18 )  
19 PG&E Corporation, ) Chapter 11  
20 ) Lead Case, Jointly Administered  
21 and )  
22 ) **MOTION PURSUANT TO FED. R. BANKR.**  
23 PACIFIC GAS AND ELECTRIC ) **PROC. 7015 AND 7017 TO ENLARGE TIME**  
24 COMPANY, ) **TO FILE PROOF OF CLAIM PURSUANT**  
25 ) **TO FED. R. BANKR. PROC. 9006(b)(1)**  
26 Debtors. )

27 [x] Affects both Debtors Date: September 13, 2022  
28 Time: 10:00 a.m. (Pacific Time)  
29 Place: Telephonic/Video Appearances Only  
30 \*All paper shall be filed in the Lead Case, United States Bankruptcy Court  
31 No. 19-30088-DM Courtroom 17,  
32 450 Golden Gate Ave., 16<sup>th</sup> Floor  
33 San Francisco, CA  
34 Judge: Hon. Dennis Montali

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1 **BACKGROUND**  
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3 Pursuant to Rules 015 and 7017 of Federal Rules of Bankruptcy Procedure, which incorporate  
4 Federal Rules of Civil Procedure 15 and 17, by this motion ("Motion"), JAMES P. HUGHES,  
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1 SIERRA S. METZ, DYLAN H. BARTELS, and SAVANNAH D. GALLARDO ("Movants") move  
2 this Court for an order expanding the time to file a Proof of Claim, and allow, Claim Numbers (not  
3 yet assigned), attached to the Declaration of Patricia A. Savage as Exhibit 1, to be considered timely  
4 filed. Claim Numbers (not yet assigned) were filed on March 31, 2022 (Hughes/Metz) and May 31,  
5 2022 (Gallardo/Bartels), respectively.

6 This Motion is based upon the points and authorities set forth herein and the concurrently  
7 filed Notice of Hearing in support of the Motion, in addition to any evidence or oral argument  
8 presented at the time of any hearing on this matter. In support thereof, the Movants, by and through  
9 their undersigned counsel, respectfully represent as follows:

#### 10 **SUMMARY OF RELIEF REQUESTED**

11 A proof of claim may be deemed timely upon a showing of excusable neglect and lack of  
12 prejudice. In this case, due to a variety of stressors arising from the Camp Fire, the impact of the  
13 Covid 19 pandemic, as well as a misunderstanding as to the legitimacy of his claim, Movants were  
14 unable to timely file their proof of claim. Because there is no danger of prejudice to the Debtors as  
15 Debtors' estates are solvent, and all creditors stand to be paid, the Motion should be granted to allow  
16 these survivors to have their claims deemed timely. This Court must determine whether to grant the  
17 Motion.

#### 18 **FACTUAL BACKGROUND**

19 The general bar date in these cases was October 21, 2019 ("Original Bar Date"). The process  
20 for submission of timely claims was continued after the Original Bar Date. Pursuant to the Stipulation  
21 Between Debtors and Official Committee of Tort Claimants to Extend Bar Date for Fire Claimants  
22 and for Appointment of Claims Representative (Dkt No. 4651), the Original Bar Date was extended  
23 for the benefit of Unfiled Fire Claimants to December 31, 2019 at 5:00 p.m. (Prevailing Pacific  
24

1 Time). The Debtors' Chapter 11 plan ("Plan") was confirmed by court order on June 20, 2020, and  
2 pursuant to the Notice of Effective Date, the Plan became effective as of July 1, 2020.

3 JAMES P. HUGES and SIERRA S. METZ are survivors of the Camp Fire that occurred on  
4 November 8, 2018. Specifically, Movants lived at the property located at 6435 Graham Road,  
5 Paradise, CA 95969 ("Property 1"). While the property was not destroyed by the Camp Fire, certain  
6 personal property belonging to Movants was destroyed. Movants were forced to evacuate due to the  
7 dangers of the fire, were temporarily displaced, and had to begin rebuilding their lives in the town of  
8 Paradise that was forever changed by the fire.

9 DYLAN H. BARTELS and SAVANNAH D. GALLARDO are survivors of the Camp Fire  
10 that occurred on November 8, 2018. Specifically, Movants lived at the property located at 14371  
11 Vine Street 3, Magalia, CA 95954 ("Property 2"). While the property was not destroyed by the Camp  
12 Fire, personal property belonging to the Movants was destroyed. Movants were forced to evacuate  
13 along back roads due to the dangers of the fire, were temporarily displaced, and had to begin  
14 rebuilding their lives in the town of Magalia that was severely and forever affected by the Camp Fire.

15 Due to multiple traumas, the immense pressure on Movants to reestablish their lives following  
16 the fire, and a misunderstanding as to the legitimacy of their claims based on a mistaken belief that  
17 they did not qualify for payment since their homes were not burned, they did not contact and retain  
18 counsel until recently. Therefore, no proof of claim was timely filed on behalf of Movements. It was  
19 not until after the extended bar date and Claims Questionnaire deadline that Movants discovered they  
20 should file a Proof of Claim for their losses. Therefore, it is respectfully requested the Court grant  
21 such relief.

## 22 LEGAL ARGUMENT

23 In a Chapter 11 case, the time to file a proof of claim may be extended under certain  
24 circumstances. Fed. R. Bank. Pro. 3003(c)(3); Fed. R. Bank. Pro. 9006(b)(1). The bankruptcy court

1 has “broad equitable powers” in a Chapter 11 case with respect to the timing requirement for proofs  
2 of claim. *Pioneer Inventory Services v. Brunswick Associates Limited Partnership*, 507 U.S. 380,  
3 389 (1993). All in all, Rule 9006(b)(1) allows “late filings caused by inadvertence, mistake, or  
4 carelessness, not just those caused by intervening circumstances beyond the party's control.” *Id.*, at  
5 381. Even a creditor that did in fact receive notice may file a proof of claim notwithstanding the  
6 expiration of a claims bar date in a Chapter 11 case upon a showing of “excusable neglect.” *Id.* at  
7 394-95 (“Had respondents here been prevented from complying with the bar date by an act of God or  
8 some other circumstance beyond their control, the Bankruptcy Court plainly would have been  
9 permitted to find ‘excusable neglect’ [under FRBP 9006].”).

10 In considering whether a creditor’s failure was the product of “excusable neglect,” the court  
11 should take “account of all relevant circumstances surrounding the party’s omission,” including “the  
12 danger of prejudice to the debtor, the length of the delay and its potential impact on judicial  
13 proceedings, the reason for the delay, including whether it was within the reasonable control of the  
14 movant, and whether the movant acted in good faith.” *Id.* at 395; see also *Corning v. Corning (In re*  
15 *Zilog, Inc.)*, 450 F.3d 996 (9th Cir. 2006) (noting Pioneer’s non-exhaustive list of relevant factors).  
16 Again, a late-filed proof of claim is allowable where a creditor had actual notice of the bankruptcy  
17 but, due to some external reason, failed to file a proof of claim or did not realize that she had to  
18 before the bar date. See, e.g., *ZiLOG, Inc. v. Corning (In re ZiLOG, Inc.)*, 450 F.3d 996, 1003-07  
19 (9th Cir. 2006) (applying the Pioneer factors). All in all, Rule 9006(b)(1) allows “late filings caused  
20 by inadvertence, mistake, or carelessness, not just those caused by intervening circumstances beyond  
21 the party's control.” *Pioneer*, 507 U.S. at 381. Here, consideration of all four Pioneer factors—as  
22 well as a fifth engrafted onto the Pioneer analysis by some courts—weighs in favor of Movants.

23 Because in this case there is no danger of prejudice to the Debtors, the first Pioneer factor  
24 weighs overwhelmingly in Movants’ favor. Debtors’ estates are solvent, and all creditors stand to be

1 paid. See, e.g., *In re Best Payphones, Inc.*, 523 B.R. 54, 75-6 (Bankr. S.D.N.Y. 2015) and *In re*  
2 *Sheehan Mem'l Hosp.*, 507 B.R. 802, 803 (Bankr. W.D.N.Y. 2014) (where the chapter 11 estate is  
3 solvent, "the proper remedy for a late filing is not the expungement of a claim, but its allowance as a  
4 tardily filed claim only.). Secondly, immediately upon receiving all the necessary information the  
5 Subject Proof of Claim was filed. Thirdly, the delay in filing the Subject Proof of Claim is reasonable  
6 considering the traumas claimant has suffered since the fire. Lastly, any prospect of prejudice beyond  
7 solvency is unlikely given (a) all distributions have not yet been made; and (b) the value of Movant's  
8 claims relative to the value of Debtors' estates is low. See, e.g., *In re Keene Corp.*, 188 B.R. 903,  
9 910 (Bankr. S.D.N.Y. 1995) (size of the late claim in relation to the estate is a consideration in  
10 determining prejudice).

11 Under Rules 7015 and 7017 of Federal Bankruptcy Procedure (which incorporate Federal  
12 Rules of Civil Procedure 15(c) and 17(a)(3)) because there is a lack of bad faith on the part of the  
13 Movant, it is respectfully requested the Court allow an extension of the bar date required to effectuate  
14 the purpose of Rules 7015 and 7015. It is respectfully requested the mistake should be allowed to be  
15 corrected by permitting the late filing of the Proof of Claim under Bankruptcy Rule 9006(b).

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1 CONCLUSION

2 For the reasons set forth above, Movants respectfully request that this Court enter an order  
3 pursuant to Bankruptcy Rules 7015, 7017, 9006(b)(1) as follows:

- 4 1. Granting this Motion;
- 5 2. Directing that Exhibit 1, the Proof of Claim, Claim Number (not yet assigned), be  
6 deemed timely filed;
- 7 3. Granting such other or further relief as the Court deems just and proper.
- 8
- 9

10 Dated: August 16, 2022

*Patricia Savage*

11 Patricia A. Savage  
12 Attorney for Claimants and Movants  
13  
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1 **PATRICIA A. SAVAGE, SBN 236235**

2 **SAVAGE & LAMB, PC**

3 1550 Humboldt Road, Suite 4

4 Chico, CA 95928

5 1550 Humboldt Road, Suite 4

6 Chico, CA 95928

7 Telephone: (530) 592-3861

8 Fax: (530) 592-3865

9 Attorney for Claimants

10 JAMES P. HUGHES and SIERRA S. METZ,

11 DYLAN H. BARTELS and SAVANNAH D. GALLARDO

12  
13 **UNITED STATES BANKRUPTCY COURT**  
14 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**  
15

16 In re

) Case No. 19-30088-DM

)

17 PG&E Corporation,

) Chapter 11

) Lead Case, Jointly Administered

18 and

)

) **ORDER GRANTING MOTION TO**

19 PACIFIC GAS AND ELECTRIC  
20 COMPANY,

) **ALLOW/DEEM TIMELY LATE FILING**

) **OF CLAIM BY JAMES HUGHES AND**

) **SIERRA METZ, AND DYLAN BARTELS**

21 Debtors.

) **AND SAVANNAH GALLARDO**

22 [x] Affects both Debtors

Date: September 13, 2022

Time: 10:00 a.m. (Pacific Time)

23 \*All paper shall be filed in the Lead Case,  
24 No. 19-30088-DM

Place: Telephonic/Video Appearances Only

United States Bankruptcy Court

Courtroom 17,

450 Golden Gate Ave., 16<sup>th</sup> Floor

San Francisco, CA

Judge: Hon. Dennis Montali

Objection Date: August 30, 2022

25  
26 James Hughes and Sierra Metz, and Dylan Bartels and Savannah Gallardo (hereinafter  
27 collectively referred to as "Movants"), having filed their motion to Allow/Deem Timely Late  
28 Filing Proof of Claim, by which Movant seeks to have their claims deemed timely; no

**ORDER GRANTING MOTION TO ALLOW/DEEM TIMELY LATE FILING OF CLAIM BY JAMES  
HUGHES AND SIERRA METZ, AND DYLAND BARTELS AND SAVANNAH GALLARDO – 1**

1 interested party having timely objected to the motion; and the relief set forth herein appearing  
2 to be well grounded; accordingly, it is

3 ORDERED, Proof of Claim (claim number not yet assigned), filed on behalf of James  
4 Hughes and Sierra Metz, is deemed timely; and it is further

5 ORDERED, Proof of Claim (claim number not yet assigned), filed on behalf of Dylan  
6 Bartels and Savannah Gallardo, is deemed timely; and it is further

7 ORDERED, the Proof of Claims and Asserted Fire Victim Claims shall for all  
8 purposes be treated and classified as Fire Victim Claims under the Plan, and shall be fully  
9 assumed by, and the sole responsibility of, the Fire Victim Trust and subject to the  
10 Channelling Injunction, to be administered, processed, settled, disallowed, resolved,  
11 liquidated, satisfied and/or paid in accordance with the Fire Victim Trust Agreement and the  
12 Fire Victim Claims Resolution Procedures.  
13

14 ORDERED, nothing herein shall be construed to be a waiver by the Debtors or the  
15 Reorganized Debtors, as applicable, the Fire Victim Trust, or any other party in interest of  
16 any right to object to the Asserted Fire Victim Claims or the Proof of Claim on any grounds  
17 other than the untimely filing thereof.

18 ORDERED, nothing herein shall be construed to be a waiver by Movants of their  
19 rights to oppose any asserted challenge to the Asserted Fire Victim Claims or the Proof of  
20 Claim.  
21

22 ORDERED, this Court shall retain jurisdiction to resolve any disputes or  
23 controversies arising from the Stipulation of this Order.

24 **\*\* END OF ORDER \*\***

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**ORDER GRANTING MOTION TO ALLOW/DEEM TIMELY LATE FILING OF CLAIM BY JAMES  
HUGHES AND SIERRA METZ, AND DYLAND BARTELS AND SAVANNAH GALLARDO – 2**



# Exhibit 1

1 **PATRICIA A. SAVAGE, SBN 236235**

2 **SAVAGE & LAMB, PC**

3 1550 Humboldt Road, Suite 4

4 Chico, CA 95928

5 1550 Humboldt Road, Suite 4

6 Chico, CA 95928

7 Telephone: (530) 592-3861

8 Fax: (530) 592-3865

9 Attorney for Claimants

10 JAMES P. HUGES and SIERRA S. METZ,

11 DYLAN H. BARTELS and SAVANNAH D. GALLARDO

12 **UNITED STATES BANKRUPTCY COURT**

13 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

14 In re

) Case No. 19-30088-DM

15 PG&E Corporation,

) Chapter 11

16 and

) Lead Case, Jointly Administered

17 PACIFIC GAS AND ELECTRIC  
18 COMPANY,

) **DECLARATION OF PATRICIA A.  
SAVAGE IN SUPPORT OF MOTION  
PURSUANT TO FED. R. BANKR. PROC.  
7015 AND 7017 TO ENLARGE TIME TO  
FILE PROOF OF CLAIM PURSUANT  
TO FED. R. BANKR. PROC. 9006(b)(1)**

19 Debtors.

20 [x] Affects both Debtors

21 \*All paper shall be filed in the Lead Case,  
22 No. 19-30088-DM

Date: September 30, 2022

Time: 10:00 a.m. (Pacific Time)

Place: Telephonic/Video Appearances Only

United States Bankruptcy Court

Courtroom 17,

450 Golden Gate Ave., 16<sup>th</sup> Floor

San Francisco, CA

Judge: Hon. Dennis Montali

23 I, Patricia A. Savage, declare as follows:

Objection Date: August 30, 2022

24 **DECLARATION OF PATRICIA A. SAVAGE IN SUPPORT OF MOTION PURSUANT TO FED. R.  
BANKR. PROC. 7015 AND 7017 TO ENLARGE TIME TO FILE PROOF OF CLAIM PURSUANT TO  
FED. R. BANKR. PROC. 9006(B)(1) – 1**

1           1.       I am an attorney at law duly licensed to practice before all state and federal  
2 courts of the State of California.

3           2.       My firm represents wildfire victims who sustained losses from the Camp Fire  
4 in 2018. My firm has timely filed on behalf of approximately 45 claimants with Prime  
5 Clerk for losses our clients suffered as a result of the Northern California Fires in 2018.

6           3.       James P. Hughes and Sierra S. Metz are survivors of the Camp Fire that  
7 occurred in 2018. James P. Hughes and Sierra S. Metz resided at 3435 Graham Road,  
8 Paradise, CA 95969.

9           4.       Attached hereto as Exhibit 2 is a true and correct copy of the Proof of Claim  
10 we prepared for Mr. Hughes and Ms. Metz on the Prime Clerk website on March 31,  
11 2022.

12           5.       Dylan H. Bartels and Savannah D. Gallardo are survivors of the Camp Fire  
13 that occurred in 2018. Dylan H. Bartels and Savannah D. Gallardo resided at 14371 Vine  
14 St. 3, Magalia, CA 95954.

15           6.       Attached hereto as Exhibit 3 is a true and correct copy of the Proof of Claim  
16 we prepared for Mr. Bartels and Mrs. Gallardo on the Prime Clerk website on May 31,  
17 2022.

18           7.       All statements in this declaration are based on my own personal knowledge  
19 and observation and from my review of the court and business records in this case, or  
20 upon information and belief as indicated. If called to testify on this matter, I can and  
21 would competently testify to the matters set forth in this Declaration.  
22

23           //

24           //

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**DECLARATION OF PATRICIA A. SAVAGE IN SUPPORT OF MOTION PURSUANT TO FED. R.  
BANKR. PROC. 7015 AND 7017 TO ENLARGE TIME TO FILE PROOF OF CLAIM PURSUANT TO  
FED. R. BANKR. PROC. 9006(B)(1) – 2**

1 I declare under penalty of perjury pursuant to the laws of the United States of  
2 America that the foregoing is true and correct.

3  
4 Executed this 16 day of August 2022, in Chico, California.

5  
6  
7  
8 Dated: August 16, 2022

Patricia Savage  
Patricia A. Savage  
Attorney for Claimants and  
Movants

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**DECLARATION OF PATRICIA A. SAVAGE IN SUPPORT OF MOTION PURSUANT TO FED. R.  
BANKR. PROC. 7015 AND 7017 TO ENLARGE TIME TO FILE PROOF OF CLAIM PURSUANT TO  
FED. R. BANKR. PROC. 9006(B)(1) – 3**

# Exhibit 2

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO DIVISION)

In re:  
PG&E CORPORATION,  
- and -  
PACIFIC GAS AND ELECTRIC  
COMPANY,  
Debtors.

Bankruptcy Case  
No. 19-30088 (DM)  
  
Chapter 11  
(Lead Case)  
(Jointly Administered)

## Proof of Claim (Fire Claim Related)

Read the instructions before filing this claim form. This form is for tort claimants who have a claim against the Debtors (i.e. PG&E Corporation and Pacific Gas and Electric Company) that arose prior to the Debtors filing for bankruptcy (i.e. prior to January 29, 2019) and that arose from, or relates to, a fire.

**Do not use this form for non-fire claims. Non-fire tort claimants should use Form 410.**

Do NOT file a fraudulent claim. A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Please type or print in the spaces below. Do NOT use red ink or pencil.

### Part 1: Identify the Claim

1. Who is the current creditor?	James P. Hughes Name of the current creditor (the person or entity to be paid for this claim)	
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. Are you filing this claim on behalf of your family? A family is a group of two or more people related by birth, marriage, domestic partnership, or adoption and residing together. All such people are considered as members of one family.	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If you checked "Yes", please provide the full name of each family member that you are filing on behalf of: _____ _____ _____ _____	
4. Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent? Name <u>Savage &amp; Lamb, PC</u> Attorney Name (if applicable) <u>E. Ryan Lamb</u> Attorney Bar Number (if applicable) <u>266850</u> Street Address <u>1550 Humboldt Road</u> City <u>Chico</u> State <u>CA</u> Zip Code <u>95928</u> Phone Number <u>5303421476</u> Email Address <u>erlamblaw@gmail.com</u>	Where should payments to the creditor be sent? (if different) Name _____ Attorney Name (if applicable) _____ Attorney Bar Number (if applicable) _____ Street Address _____ City _____ State _____ Zip Code _____ Phone Number _____ Email Address _____
5. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY	
6. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	

**Part 2: Give Information About the Claim as of the Date this Claim Form is Filed**

7. What fire is the basis of your claim? Check all that apply.	<input checked="" type="checkbox"/> Camp Fire (2018) <input type="checkbox"/> North Bay Fires (2017) <input type="checkbox"/> Ghost Ship Fire (2016) <input type="checkbox"/> Butte Fire (2015) <input type="checkbox"/> Other (please provide date and brief description of fire: _____)
8. What are the loss location(s) where you and/or your family suffered harm? (e.g. home or business address, place of injury, place from which you were evacuated, if different.)	Location(s): 3435 Graham Road, Paradise, CA 95969
9. How were you and/or your family harmed? Check all that apply	<input checked="" type="checkbox"/> Property Damage (homes, structures, personal property, land, trees, landscaping, and all other property damage) <input type="checkbox"/> Owner <input checked="" type="checkbox"/> Renter <input type="checkbox"/> Occupant <input type="checkbox"/> Other (Please specify): _____ <input checked="" type="checkbox"/> Personal Injury <input type="checkbox"/> Wrongful Death (if checked, please provide the name of the deceased): _____ <input type="checkbox"/> Business Loss/Interruption <input type="checkbox"/> Lost wages and earning capacity <input checked="" type="checkbox"/> Loss of community and essential services <input type="checkbox"/> Agricultural loss <input type="checkbox"/> Other (Please specify): _____
10. What damages are you and/or your family claiming/seeking? Check all that apply	<input checked="" type="checkbox"/> Economic damages (including replacement cost of damaged property, diminution in value, loss of use, lost inventory, lost profits, and other economic damage) <input checked="" type="checkbox"/> Non-economic damages (including loss of society and support, loss of consortium, pain and suffering, emotional distress, annoyance and discomfort, and other non-economic damage) <input checked="" type="checkbox"/> Punitive, exemplary, and statutory damages <input checked="" type="checkbox"/> Attorney's fees and litigation costs <input checked="" type="checkbox"/> Interest <input checked="" type="checkbox"/> Any and all other damages recoverable under California law <input type="checkbox"/> Other (Please specify): _____
11. How much is the claim?	<input type="checkbox"/> \$ _____ (optional) <input checked="" type="checkbox"/> Unknown / To be determined at a later date

**Part 3: Sign Below**

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

- ☐ I am the creditor.  
☒ I am the creditor's attorney or authorized agent.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Signature: E. Ryan Lamb

Email: erlamblaw@gmail.com

Signature

Print the name of the person who is completing and signing this claim:

Name	<u>Eric R Lamb</u>		
	First name	Middle name	Last name
Title	<u>Attorney</u>		
Company	<u>Savage &amp; Lamb, PC</u>		
	Identify the corporate servicer as the company if the authorized agent is a servicer.		
Address	<u>1550 Humboldt Road</u>		
	Number	Street	
	<u>Chico</u>	<u>CA</u>	<u>95928</u>
	City	State	ZIP Code
Contact phone	<u>5303421476</u>	Email	<u>erlamblaw@gmail.com</u>



**Attach Supporting Documentation** (limited to a single PDF attachment that is less than 5 megabytes in size and under 100 pages):

☐ I have supporting documentation.  
(attach below)

☒ I do not have supporting documentation.

**PLEASE REVIEW YOUR PROOF OF CLAIM AND SUPPORTING DOCUMENTS AND REDACT ACCORDINGLY PRIOR TO UPLOADING THEM. PROOFS OF CLAIM AND ATTACHMENTS ARE PUBLIC DOCUMENTS THAT WILL BE AVAILABLE FOR ANYONE TO VIEW ONLINE.**

**IMPORTANT NOTE REGARDING REDACTING YOUR PROOF OF CLAIM AND SUPPORTING DOCUMENTATION** When you submit a proof of claim and any supporting documentation you must show only the last four digits of any social-security, individual's tax-identification, or financial-account number, only the initials of a minor's name, and only the year of any person's date of birth. If the claim is based on the delivery of health care goods or services, limit the disclosure of the goods or services so as to avoid embarrassment or the disclosure of confidential health care information.

A document has been redacted when the person filing it has masked, edited out, or otherwise deleted, certain information. The responsibility for redacting personal data identifiers (as defined in Federal Rule of Bankruptcy Procedure 9037) rests solely with the party submitting the documentation and their counsel. Prime Clerk and the Clerk of the Court will not review any document for redaction or compliance with this Rule and you hereby release and agree to hold harmless Prime Clerk and the Clerk of the Court from the disclosure of any personal data identifiers included in your submission. In the event Prime Clerk or the Clerk of the Court discover that personal identifier data or information concerning a minor individual has been included in a pleading, Prime Clerk and the Clerk of the Court are authorized, in their sole discretion, to redact all such information from the text of the filing and make an entry indicating the correction.

# Instructions for Proof of Claim (Fire Claim Related)

United States Bankruptcy Court

You may have a claim against the Debtors for monetary loss, personal injury (including death), or other asserted damages arising out of or related to a fire. You should consider obtaining the advice of an attorney, especially if you are unfamiliar with the chapter 11 process and privacy regulations.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both.  
18 U.S.C. §§ 152, 157 and 3571.

## How to fill out this form

- **Fill in all of the information about the claim as of the date this claim form is filed.**
- **If the claim has been acquired from someone else, then state the identity of the last party who owned the claim or was the holder of the claim and who transferred it to you before the initial claim was filed.**
- **For a minor child, fill in only the child's initials and the full name of the child's parent or guardian.** For example, write *A.B., a minor child (John Doe, parent)*. See Bankruptcy Rule 9037.
- **You may but are not required to attach supporting documents to this form.**  
Supporting documents will be gathered, maintained, and provided at a later date as instructed by the Court. If you do attach documents, you should attach redacted documents as supporting documentation will be made publicly available and will not be kept confidential. *See* the definition of *redaction* of information below.
- **Do not attach original documents because attachments may be destroyed after scanning.**
- **Question 3.** Members of a family may but are not required to file a proof of claim as a family but may, if they choose, submit individual claim forms for each family member that has a claim against the debtors.
- **Question 9.** If you suffered property damage, then provide the street address of each real property parcel where you suffered property damage. If you were personally evacuated as the result of a fire, then provide the address or intersection closest to where you encountered the fire and began evacuation. If you suffered property damage and were evacuated from a different location, include both. If you were a renter, provide the address of your residence.
- **Question 10.** This question requests general statements of underlying facts relating to harm and is not intended to be exhaustive or preclusive.
- **Question 11.** You are not required to include a claim amount with your proof of claim. Providing a claim amount at this time is optional.

## Confirmation that the claim has been filed

To receive confirmation that the claim has been filed, enclose a stamped self-addressed envelope and a copy of this form together with the original. You may view a list of filed claims in this case by visiting the Claims and Noticing Agent's website at <https://restructuring.primeclerk.com/pge>.

## Understand the terms used in this form

**Claim:** A creditor's right to receive payment for a debt that the debtor owed on the date the debtor filed for bankruptcy. 11 U.S.C. § 101 (5). A claim may be secured or unsecured.

**Creditor:** A person, corporation, or other entity to whom a debtor owes a debt that was incurred on or before the date the debtor filed for bankruptcy. 11 U.S.C. § 101 (10).

**Debtor:** A person, corporation, or other entity who is in bankruptcy. In this instance, PG&E Corporation and Pacific Gas & Electric Company.

**Information that is entitled to privacy:** A *Proof of Claim* form and any attached documents must show only the last 4 digits of any social security number, an individual's tax identification number, or a financial account number, only the initials of a minor's name, and only the year of any person's date of birth. If a claim is based on delivering health care goods or services, limit the disclosure of the goods or services to avoid embarrassment or disclosure of confidential health care information. You may later be required to give more information if the trustee or someone else in interest objects to the claim.

**Proof of claim:** A form that shows the creditor has a claim against the debtors on or before the date of the bankruptcy filing (in these cases, January 29, 2019). The form must be filed in the district where the case is pending.

**Redaction of information:** Masking, editing out, or deleting certain information to protect privacy. Filers must redact or leave out information entitled to **privacy** on the *Proof of Claim* form and any attached documents.

## Offers to purchase a claim

Certain entities purchase claims for an amount that is less than the face value of the claims. These entities may contact creditors offering to purchase their claims. Some written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court, the bankruptcy trustee, or the debtor. A creditor has no obligation to sell its claim. However, if a creditor decides to sell its claim, any transfer of that claim is subject to Bankruptcy Rule 3001(e), any provisions of the Bankruptcy Code (11 U.S.C. § 101 et seq.) that apply, and any orders of the bankruptcy court that apply.

## Please send completed Proof(s) of Claim to:

### If by first class mail:

PG&E Corporation Claims Processing Center  
c/o Prime Clerk LLC  
Grand Central Station, PO Box 4850  
New York, NY 10163-4850

### If by overnight courier or hand delivery:

PG&E Corporation Claims Processing Center  
c/o Prime Clerk LLC  
850 Third Avenue, Suite 412  
Brooklyn, NY 11232

**You may also hand deliver your completed Proof(s) of Claim to any of the following service center offices (beginning July 15, 2019 through the Bar Date (October 21, 2019) during the hours of 8:30 a.m. – 5:00 p.m. Prevailing Pacific Time):**

Chico Service Center  
350 Salem Street  
Chico, CA 95928

Marysville Service Center  
231 "D" Street  
Marysville, CA 95901

Napa Service Center  
1850 Soscol Ave. Ste 105  
Napa, CA 94559

Oroville Service Center  
1567 Huntoon Street  
Oroville, CA 95965

Redding Service Center  
3600 Meadow View Road  
Redding, CA 96002

Santa Rosa Service Center  
111 Stony Circle  
Santa Rosa, CA 95401

**Photocopy machines will not be available at the Claim Service Centers; you must bring a photocopy of your Proof of Claim if you wish to receive a date-stamped copy.**

**Do not file these instructions with your form**

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO DIVISION)

In re:

PG&E CORPORATION,  
- and -  
PACIFIC GAS AND ELECTRIC  
COMPANY,  
Debtors.

Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11  
(Lead Case)  
(Jointly Administered)

## Proof of Claim (Fire Claim Related)

Read the instructions before filing this claim form. This form is for tort claimants who have a claim against the Debtors (i.e. PG&E Corporation and Pacific Gas and Electric Company) that arose prior to the Debtors filing for bankruptcy (i.e. prior to January 29, 2019) and that arose from, or relates to, a fire.

**Do not use this form for non-fire claims. Non-fire tort claimants should use Form 410.**

Do NOT file a fraudulent claim. A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Please type or print in the spaces below. Do NOT use red ink or pencil.

### Part 1: Identify the Claim

1. Who is the current creditor?	Sierra S. Metz Name of the current creditor (the person or entity to be paid for this claim)	
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. Are you filing this claim on behalf of your family? A family is a group of two or more people related by birth, marriage, domestic partnership, or adoption and residing together. All such people are considered as members of one family.	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If you checked "Yes", please provide the full name of each family member that you are filing on behalf of: _____ _____ _____ _____	
4. Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent? Name <u>Savage &amp; Lamb, PC</u> Attorney Name (if applicable) <u>E. Ryan Lamb</u> Attorney Bar Number (if applicable) <u>266850</u> Street Address <u>1550 Humboldt Road, Ste 4</u> City <u>Chico</u> State <u>CA</u> Zip Code <u>95928</u> Phone Number <u>5303421476</u> Email Address <u>erlamblaw@gmail.com</u>	Where should payments to the creditor be sent? (if different) Name _____ Attorney Name (if applicable) _____ Attorney Bar Number (if applicable) _____ Street Address _____ City _____ State _____ Zip Code _____ Phone Number _____ Email Address _____
5. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY	
6. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	

**Part 2:****Give Information About the Claim as of the Date this Claim Form is Filed**

7. What fire is the basis of your claim?

Check all that apply.

- ☒ Camp Fire (2018)  
☐ North Bay Fires (2017)  
☐ Ghost Ship Fire (2016)  
☐ Butte Fire (2015)  
☐ Other (please provide date and brief description of fire: \_\_\_\_\_)

8. What are the loss location(s) where you and/or your family suffered harm? (e.g. home or business address, place of injury, place from which you were evacuated, if different.)

Location(s): 3435 Graham Road, Paradise, CA 95969

9. How were you and/or your family harmed?

Check all that apply

- ☒ Property Damage (homes, structures, personal property, land, trees, landscaping, and all other property damage)  
☐ Owner ☒ Renter ☐ Occupant ☐ Other (Please specify): \_\_\_\_\_  
☒ Personal Injury  
☐ Wrongful Death (if checked, please provide the name of the deceased): \_\_\_\_\_  
☐ Business Loss/Interruption  
☐ Lost wages and earning capacity  
☒ Loss of community and essential services  
☐ Agricultural loss  
☐ Other (Please specify): \_\_\_\_\_

10. What damages are you and/or your family claiming/seeking?

Check all that apply

- ☒ Economic damages (including replacement cost of damaged property, diminution in value, loss of use, lost inventory, lost profits, and other economic damage)  
☒ Non-economic damages (including loss of society and support, loss of consortium, pain and suffering, emotional distress, annoyance and discomfort, and other non-economic damage)  
☒ Punitive, exemplary, and statutory damages  
☒ Attorney's fees and litigation costs  
☒ Interest  
☒ Any and all other damages recoverable under California law  
☐ Other (Please specify): \_\_\_\_\_

11. How much is the claim?

- ☐ \$ \_\_\_\_\_ (optional)  
☒ Unknown / To be determined at a later date

**Part 3: Sign Below**

The person completing this proof of claim must sign and date it.  
FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both.  
18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

- ☐ I am the creditor.  
☒ I am the creditor's attorney or authorized agent.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Signature: E. Ryan Lamb

Email: erlamblaw@gmail.com

\_\_\_\_\_  
Signature

Print the name of the person who is completing and signing this claim:

Name	<u>E. Ryan Lamb</u>		
	First name	Middle name	Last name
Title	<u>Attorney</u>		
Company	<u>Savage &amp; Lamb, PC</u>		
	Identify the corporate servicer as the company if the authorized agent is a servicer.		
Address	<u>1550 Humboldt Road</u>		
	Number	Street	
	<u>Chico</u>		<u>CA 95928</u>
	City	State	ZIP Code
Contact phone	<u>5303421476</u>	Email	<u>erlamblaw@gmail.com</u>

**Attach Supporting Documentation** (limited to a single PDF attachment that is less than 5 megabytes in size and under 100 pages):

☐ I have supporting documentation.  
(attach below)

☒ I do not have supporting documentation.

**PLEASE REVIEW YOUR PROOF OF CLAIM AND SUPPORTING DOCUMENTS AND REDACT ACCORDINGLY PRIOR TO UPLOADING THEM. PROOFS OF CLAIM AND ATTACHMENTS ARE PUBLIC DOCUMENTS THAT WILL BE AVAILABLE FOR ANYONE TO VIEW ONLINE.**

**IMPORTANT NOTE REGARDING REDACTING YOUR PROOF OF CLAIM AND SUPPORTING DOCUMENTATION** When you submit a proof of claim and any supporting documentation you must show only the last four digits of any social-security, individual's tax-identification, or financial-account number, only the initials of a minor's name, and only the year of any person's date of birth. If the claim is based on the delivery of health care goods or services, limit the disclosure of the goods or services so as to avoid embarrassment or the disclosure of confidential health care information.

A document has been redacted when the person filing it has masked, edited out, or otherwise deleted, certain information. The responsibility for redacting personal data identifiers (as defined in Federal Rule of Bankruptcy Procedure 9037) rests solely with the party submitting the documentation and their counsel. Prime Clerk and the Clerk of the Court will not review any document for redaction or compliance with this Rule and you hereby release and agree to hold harmless Prime Clerk and the Clerk of the Court from the disclosure of any personal data identifiers included in your submission. In the event Prime Clerk or the Clerk of the Court discover that personal identifier data or information concerning a minor individual has been included in a pleading, Prime Clerk and the Clerk of the Court are authorized, in their sole discretion, to redact all such information from the text of the filing and make an entry indicating the correction.



# Instructions for Proof of Claim (Fire Claim Related)

United States Bankruptcy Court

You may have a claim against the Debtors for monetary loss, personal injury (including death), or other asserted damages arising out of or related to a fire. You should consider obtaining the advice of an attorney, especially if you are unfamiliar with the chapter 11 process and privacy regulations.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both.  
18 U.S.C. §§ 152, 157 and 3571.

## How to fill out this form

- **Fill in all of the information about the claim as of the date this claim form is filed.**
- **If the claim has been acquired from someone else, then state the identity of the last party who owned the claim or was the holder of the claim and who transferred it to you before the initial claim was filed.**
- **For a minor child, fill in only the child's initials and the full name of the child's parent or guardian.** For example, write *A.B., a minor child (John Doe, parent)*. See Bankruptcy Rule 9037.
- **You may but are not required to attach supporting documents to this form.**  
Supporting documents will be gathered, maintained, and provided at a later date as instructed by the Court. If you do attach documents, you should attach redacted documents as supporting documentation will be made publicly available and will not be kept confidential. See the definition of *redaction* of information below.
- **Do not attach original documents because attachments may be destroyed after scanning.**
- **Question 3.** Members of a family may but are not required to file a proof of claim as a family but may, if they choose, submit individual claim forms for each family member that has a claim against the debtors.

- **Question 9.** If you suffered property damage, then provide the street address of each real property parcel where you suffered property damage. If you were personally evacuated as the result of a fire, then provide the address or intersection closest to where you encountered the fire and began evacuation. If you suffered property damage and were evacuated from a different location, include both. If you were a renter, provide the address of your residence.
- **Question 10.** This question requests general statements of underlying facts relating to harm and is not intended to be exhaustive or preclusive.
- **Question 11.** You are not required to include a claim amount with your proof of claim. Providing a claim amount at this time is optional.

## Confirmation that the claim has been filed

To receive confirmation that the claim has been filed, enclose a stamped self-addressed envelope and a copy of this form together with the original. You may view a list of filed claims in this case by visiting the Claims and Noticing Agent's website at <https://restructuring.primeclerk.com/pge>.



## Understand the terms used in this form

**Claim:** A creditor's right to receive payment for a debt that the debtor owed on the date the debtor filed for bankruptcy. 11 U.S.C. § 101 (5). A claim may be secured or unsecured.

**Creditor:** A person, corporation, or other entity to whom a debtor owes a debt that was incurred on or before the date the debtor filed for bankruptcy. 11 U.S.C. § 101 (10).

**Debtor:** A person, corporation, or other entity who is in bankruptcy. In this instance, PG&E Corporation and Pacific Gas & Electric Company.

**Information that is entitled to privacy:** A *Proof of Claim* form and any attached documents must show only the last 4 digits of any social security number, an individual's tax identification number, or a financial account number, only the initials of a minor's name, and only the year of any person's date of birth. If a claim is based on delivering health care goods or services, limit the disclosure of the goods or services to avoid embarrassment or disclosure of confidential health care information. You may later be required to give more information if the trustee or someone else in interest objects to the claim.

**Proof of claim:** A form that shows the creditor has a claim against the debtors on or before the date of the bankruptcy filing (in these cases, January 29, 2019). The form must be filed in the district where the case is pending.

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## Please send completed Proof(s) of Claim to:

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c/o Prime Clerk LLC  
Grand Central Station, PO Box 4850  
New York, NY 10163-4850

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Brooklyn, NY 11232

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Chico, CA 95928

Marysville Service Center  
231 "D" Street  
Marysville, CA 95901

Napa Service Center  
1850 Soscol Ave. Ste 105  
Napa, CA 94559

Oroville Service Center  
1567 Huntoon Street  
Oroville, CA 95965

Redding Service Center  
3600 Meadow View Road  
Redding, CA 96002

Santa Rosa Service Center  
111 Stony Circle  
Santa Rosa, CA 95401

**Photocopy machines will not be available at the Claim Service Centers; you must bring a photocopy of your Proof of Claim if you wish to receive a date-stamped copy.**

**Do not file these instructions with your form**

# Exhibit 3

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO DIVISION)

In re:  
PG&E CORPORATION,  
- and -  
PACIFIC GAS AND ELECTRIC  
COMPANY,  
Debtors.

Bankruptcy Case  
No. 19-30088 (DM)  
  
Chapter 11  
(Lead Case)  
(Jointly Administered)

## Proof of Claim (Fire Claim Related)

Read the instructions before filing this claim form. This form is for tort claimants who have a claim against the Debtors (i.e. PG&E Corporation and Pacific Gas and Electric Company) that arose prior to the Debtors filing for bankruptcy (i.e. prior to January 29, 2019) and that arose from, or relates to, a fire.

**Do not use this form for non-fire claims. Non-fire tort claimants should use Form 410.**

Do NOT file a fraudulent claim. A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Please type or print in the spaces below. Do NOT use red ink or pencil.

### Part 1: Identify the Claim

1. Who is the current creditor?	Savannah Dawn Gallardo Name of the current creditor (the person or entity to be paid for this claim)	
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. Are you filing this claim on behalf of your family? A family is a group of two or more people related by birth, marriage, domestic partnership, or adoption and residing together. All such people are considered as members of one family.	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes If you checked "Yes", please provide the full name of each family member that you are filing on behalf of: Dylan Harry Bartels _____ _____ _____ _____	
4. Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent? Name <u>Savage &amp; Lamb, PC</u> Attorney Name (if applicable) <u>E. Ryan Lamb</u> Attorney Bar Number (if applicable) <u>266850</u> Street Address <u>1550 Humboldt Road, Ste 4</u> City <u>Chico</u> State <u>CA</u> Zip Code <u>95928</u> Phone Number <u>5303421476</u> Email Address <u>erlamblaw@gmail.com</u>	Where should payments to the creditor be sent? (if different) Name _____ Attorney Name (if applicable) _____ Attorney Bar Number (if applicable) _____ Street Address _____ City _____ State _____ Zip Code _____ Phone Number _____ Email Address _____
5. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ MM / DD / YYYY	
6. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	

**Part 2: Give Information About the Claim as of the Date this Claim Form is Filed**

<b>7. What fire is the basis of your claim?</b> Check all that apply.	<input checked="" type="checkbox"/> Camp Fire (2018) <input type="checkbox"/> North Bay Fires (2017) <input type="checkbox"/> Ghost Ship Fire (2016) <input type="checkbox"/> Butte Fire (2015) <input type="checkbox"/> Other (please provide date and brief description of fire: _____)
<b>8. What are the loss location(s) where you and/or your family suffered harm? (e.g. home or business address, place of injury, place from which you were evacuated, if different?)</b>	Location(s): <b>14371 Vine Street, 3 Magalia, CA 95954</b>
<b>9. How were you and/or your family harmed?</b> Check all that apply	<input checked="" type="checkbox"/> Property Damage (homes, structures, personal property, land, trees, landscaping, and all other property damage) <input type="checkbox"/> Owner <input checked="" type="checkbox"/> Renter <input type="checkbox"/> Occupant <input type="checkbox"/> Other (Please specify): _____ <input checked="" type="checkbox"/> Personal Injury <input type="checkbox"/> Wrongful Death (if checked, please provide the name of the deceased) _____ <input type="checkbox"/> Business Loss/Interruption <input checked="" type="checkbox"/> Lost wages and earning capacity <input type="checkbox"/> Loss of community and essential services <input type="checkbox"/> Agricultural loss <input checked="" type="checkbox"/> Other (Please specify): <b>Any other relief deemed appropriate</b>
<b>10. What damages are you and/or your family claiming/seeking?</b> Check all that apply	<input checked="" type="checkbox"/> Economic damages (including replacement cost of damaged property, diminution in value, loss of use, lost inventory, lost profits, and other economic damage) <input checked="" type="checkbox"/> Non-economic damages (including loss of society and support, loss of consortium, pain and suffering, emotional distress, annoyance and discomfort, and other non-economic damage) <input checked="" type="checkbox"/> Punitive, exemplary, and statutory damages <input checked="" type="checkbox"/> Attorney's fees and litigation costs <input checked="" type="checkbox"/> Interest <input checked="" type="checkbox"/> Any and all other damages recoverable under California law <input type="checkbox"/> Other (Please specify): _____
<b>11. How much is the claim?</b>	<input type="checkbox"/> \$ _____ (optional) <input checked="" type="checkbox"/> Unknown / To be determined at a later date

**Part 3: Sign Below**

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

- ☐ I am the creditor.  
☒ I am the creditor's attorney or authorized agent.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Signature: E. Ryan Lamb

Email: erlamblaw@gmail.com

Signature

Print the name of the person who is completing and signing this claim:

Name	<u>Eric Ryan Lamb</u>		
	First name	Middle name	Last name
Title	<u>Attorney</u>		
Company	<u>Savage &amp; Lamb, PC</u>		
	Identify the corporate servicer as the company if the authorized agent is a servicer.		
Address	<u>1550 Humboldt Road</u>		
	Number	Street	
	<u>Chico</u>	<u>CA</u>	<u>95928</u>
	City	State	ZIP Code
Contact phone	<u>5303421476</u>	Email	<u>erlamblaw@gmail.com</u>

**Attach Supporting Documentation** (limited to a single PDF attachment that is less than 5 megabytes in size and under 100 pages):

☒ I have supporting documentation.  
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A document has been redacted when the person filing it has masked, edited out, or otherwise deleted, certain information. The responsibility for redacting personal data identifiers (as defined in Federal Rule of Bankruptcy Procedure 9037) rests solely with the party submitting the documentation and their counsel. Prime Clerk and the Clerk of the Court will not review any document for redaction or compliance with this Rule and you hereby release and agree to hold harmless Prime Clerk and the Clerk of the Court from the disclosure of any personal data identifiers included in your submission. In the event Prime Clerk or the Clerk of the Court discover that personal identifier data or information concerning a minor individual has been included in a pleading, Prime Clerk and the Clerk of the Court are authorized, in their sole discretion, to redact all such information from the text of the filing and make an entry indicating the correction.

# Instructions for Proof of Claim (Fire Claim Related)

United States Bankruptcy Court

You may have a claim against the Debtors for monetary loss, personal injury (including death), or other asserted damages arising out of or related to a fire. You should consider obtaining the advice of an attorney, especially if you are unfamiliar with the chapter 11 process and privacy regulations.

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18 U.S.C. §§ 152, 157 and 3571.

## How to fill out this form

- **Fill in all of the information about the claim as of the date this claim form is filed.**
- **If the claim has been acquired from someone else, then state the identity of the last party** who owned the claim or was the holder of the claim and who transferred it to you before the initial claim was filed.
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- **Question 3.** Members of a family may but are not required to file a proof of claim as a family but may, if they choose, submit individual claim forms for each family member that has a claim against the debtors.
- **Question 9.** If you suffered property damage, then provide the street address of each real property parcel where you suffered property damage. If you were personally evacuated as the result of a fire, then provide the address or intersection closest to where you encountered the fire and began evacuation. If you suffered property damage and were evacuated from a different location, include both. If you were a renter, provide the address of your residence.
- **Question 10.** This question requests general statements of underlying facts relating to harm and is not intended to be exhaustive or preclusive.
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To receive confirmation that the claim has been filed, enclose a stamped self-addressed envelope and a copy of this form together with the original. You may view a list of filed claims in this case by visiting the Claims and Noticing Agent's website at <https://restructuring.primeclerk.com/pge>.

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## Please send completed Proof(s) of Claim to:

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Marysville, CA 95901

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Napa, CA 94559

Oroville Service Center  
1567 Huntoon Street  
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**Photocopy machines will not be available at the Claim Service Centers; you must bring a photocopy of your Proof of Claim if you wish to receive a date-stamped copy.**

**Do not file these instructions with your form**



1 **PATRICIA A. SAVAGE, SBN 236235**  
2 **SAVAGE & LAMB, PC**  
3 1550 Humboldt Road, Suite 4  
4 Chico, CA 95928  
5 1550 Humboldt Road, Suite 4  
6 Chico, CA 95928  
7 Telephone: (530) 592-3861  
8 Fax: (530) 592-3865

9 **UNITED STATES BANKRUPTCY COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

11 In re ) Case No. 19-30088-DM  
12 PG&E Corporation, )  
13 and ) Chapter 11  
14 ) Lead Case, Jointly Administered  
15 )  
16 ) **PROOF OF SERVICE**  
17 )  
18 ) Date: September 13, 2022  
19 ) Time: 10:00 a.m. (Pacific Time)  
20 ) Place: Telephonic/Video Appearances Only  
21 United States Bankruptcy Court  
22 Courtroom 17,  
23 450 Golden Gate Ave., 16<sup>th</sup> Floor  
24 San Francisco, CA  
Judge: Hon. Dennis Montali

Objection Date: August 30, 2022

**CERTIFICATE OF SERVICE**

I, Brandie Bridgnell, do declare and state as follows:

1. I am employed at Savage & Lamb, PC, the attorneys that represent the Movants, James Hughes and Sierra Metz, and Dylan Bartels and Savannah Gallardo, in the above referenced chapter 11 bankruptcy case and am not a party to the action.
2. On August 16, 2022, I served the following documents by the method set forth on the Master Service List attached hereto as Exhibit "A":

- 1 - NOTICE OF HEARING PURSUANT TO FED. R. BANKR. PROC. 7015 AND
- 2 7017 TO ENLARGE TIME TO FILE PROOF OF CLAIM PURSUANT TO FED. R.
- 3 BANKR. PROC. 9006(b)(1) (the "*Notice of Hearing*")
- 4 - MOTION PURSUANT TO FED. R. BANKR. PROC. 7015 AND 7017 TO
- 5 ENLARGE TIME TO FILE PROOF OF CLAIM PURUSANT TO FED. R. BANKR.
- 6 PROC. 9006(b)(1) (the "*Motion*")
- 7 - ORDER GRANTING MOTION TO ALLOW/DEEM TIMELY LATE FILING OF
- 8 CLAIM BY JAMES HUGHES AND SIERRA METZ, AND DYLAN BARTELS
- 9 AND SAVANNAH GALLARDO (the "*Order*")
- 10 - DECLARATION OF PATRICIA A. SAVAGE IN SUPPORT OF MOTION
- 11 PURSUANT TO FED. R. BANKR. PROC. 7015 AND 7107 TO ENLARGE TIME
- 12 TO FILE PROOF OF CLAIM PURSUANT TO FED. R. BANKR. PROC. 9006(b)(1)
- 13 (the "*Declaration of Patricia Savage, Exhibit "1"*")
- 14 - PROOFS OF CLAIM FILED BY MOVANTS ATTORNEY (the "*Proof of Claim*
- 15 *Exhibit "2", "3"*")
- 16 3. On August 16, 2022, at the direction of Patricia A. Savage, attorney at Savage &
- 17 Lamb, PC, caused the Notice of Hearing, Motion, Order, the Declaration of Patricia
- 18 Savage, and Exhibits "2" & "3", to be served via first class mail and email on Abbey,
- 19 Weitzenberg, Warren & Emery, P.C., Attn: Brendan M. Kunkle, Michael D. Green,
- 20 100 Stony Point Road, Suite 200, Santa Rosa, CA 95401, [bkunkle@abbeylaw.com](mailto:bkunkle@abbeylaw.com);
- 21 [mgreen@abbeylaw.com](mailto:mgreen@abbeylaw.com)., Corey, Luzaich De Ghetaldi & Riddle LLP, Attn. Dario De
- 22 Ghetaldi, Amanda L. Riddle, 700 El Camino Real PO BOX 669, Millbrae, CA 94030,
- 23 [deg@coreylaw.com](mailto:deg@coreylaw.com), [alr@coreylaw.com](mailto:alr@coreylaw.com), Danko Meredith Attn: Kristine K. Meredith,
- 24 333 Twin Dolphin Dr. Ste. 145, Redwood Shores, CA 94605,

1 kmeredith@dankolaw.com, Gibbs Law Group LLP, Attn: Eric Gibbs, Dylan Hughes,  
2 505 14th St. Ste 1110 Oakland, CA 94612, ehg@classlawgroup.com,  
3 dsh@classlawgroup.com; via email to PG&E Counsel, Kevin Kramer,  
4 Kevin.Kramer@weil.com.

- 5 4. I have reviewed the Notices of Electronic Filing for the above-listed documents, and I  
6 understand that parties listed in each NEF as having received notice through  
7 electronic mail were electronically served with that document through the Court's  
8 Electronic Case Filing system.
- 9 5. I declare under penalty of perjury under the laws of the United States of America, that  
10 the foregoing is true and correct and that if called upon as a witness, I could and  
11 would competently testify thereto.

12  
13 Executed this 16 day of August 2022, at Chico, California.

14  
15   
16 \_\_\_\_\_  
17 Brandie Bridgnell  
18  
19  
20  
21  
22  
23  
24

# Exhibit A

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